REMARKS

Several editorial corrections have been made to the specification. Claims 1 - 3, 6 - 10, 16, and 18 - 19 have been amended. No new matter has been introduced with these corrections or amendments, all of which are supported in the specification as originally filed. Claims 1 - 19 remain in the application.

I.   Drawing Correction

A proposed drawing correction is submitted herewith for Fig. 8, adding a missing reference number 830, as discussed above in "Amendments to the Drawings". No new matter is introduced with this proposed correction, which is supported in the specification as originally filed.

II.   Rejection under 35 U.S.C. §103

Paragraph 2 of the Office Action dated December 23, 2003 (hereinafter, "the Office Action") states that Claims 1 - 19 are rejected under 35 U.S.C. §103(a) as being unpatentable over Downs et al., U. S. Patent 6,070,176. This rejection is respectfully traversed.

Applicants' independent Claims 1, 18, and 19 (as amended herein) specify that a user selects an element of a rendered representation of an electronic object to indicate that this element is to become an organizing criterion. For example, the user might swipe a pointing device such as a mouse (Claim 11) or light pen (Claim 12) across a series of contiguous characters (Claim 3) or a

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portion of an image (Claim 6). See, for example, Figs. 10A and 10B of Applicants' specification and their corresponding text, where these techniques are described.

Use of the term "select" in Downs' teachings has a different meaning. In col. 1, line 27, Downs uses "select" when discussing how a hypertext link enables a user to signal a computer ("A hypertext link enables a computer to select a word, phrase or an image ... to signal the computer [to] retrieve a referenced Web document ..."). As is well known in the art, this type of "selection" of a hypertext link comprises double-clicking on the link to cause an underlying, predetermined function to be activated (i.e., issuing an HTTP GET request for content stored at a predetermined location). Use of the term "selecting" in col. 3, line 31, is similar, referring again to the user double-clicking on something configured as a hypertext anchor (whether that is a "key word, phrase, or image", as taught by Downs) to activate a hyperlink.

Activating a hyperlink does not result in creation of organizing criteria, either in the prior art or in Downs' teachings. (Applicants note that the cited text in col. 1, lines 20 - 42 and col. 3, lines 25 - 40 is a discussion of hyperlink functionality of the prior art, and is merely background information.)

The organization of displayed objects according to Downs' teachings is based on the relevance of each object to a set of search criteria. This is stated throughout the Downs text. See, for example, col. 4, lines 52 - 55, "The present invention ... graphically indicates the

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relevance of particular Web documents to a user's search criteria" (emphasis added). The search

criteria are provided to a search agent, which formats them for use by a conventional search

engine, and this conventional search engine performs the actual searching. See elements **51** and

53 of Fig. 6, as well as the corresponding text in col. 4, lines 63 - 67. Once the search results are

received from the conventional search engine, the search agent performs additional analysis on

those results to determine which ones of the results are "most relevant" to the user-provided

search criteria. See col. 4, line 67 - col. 5, line 5. Thus, Downs' displayed results are organized

according to "relevance", not according to the search criteria *per se.*

Applicants' independent Claims 1, 18, and 19 are amended herein to more clearly specify

that the selecting step operates on a rendered representation of an electronic object. For example,

if the text of an e-mail object is rendered, then the might can select a word or phrase by swiping

across that word or phrase. (See p. 35, line 13 - p. 36, line 8, where this is discussed in

Applicants' specification.) Applicants' independent claims are also amended herein to more

clearly specify that the "defined selection settings" are settings which were defined to connote

selection of organizing criteria. For example, the defined settings might indicate that the user has

to swipe across an element twice (or perhaps some other number of times), and if this happens,

then this indicates that the user wants this element to become an organizing criterion. (See p. 37,

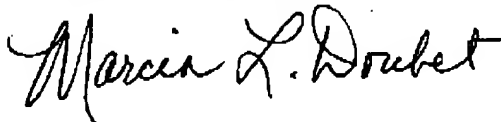lines 7 - 14, where the settings for a swiping operation are discussed.)

Applicants respectfully submit that Downs does not teach use of selection settings that

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have been defined to connote selection of organizing criteria. Furthermore, Downs does not

teach selecting an element from a rendered electronic object to indicate that this element should

become an organizing criterion. Accordingly, Applicants respectfully submit that their

independent Claims 1, 18, and 19, as amended herein, are patentable over the cited reference. By

virtue of the allowability of the independent claims, Applicants' dependent Claims 2 - 17 are

deemed patentable as well. The Examiner is therefore respectfully requested to withdraw the

§103(a) rejection.

III.   Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal

of all presently outstanding rejections, and allowance of all claims at an early date.

Respectfully submitted,

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Attachment: Replacement Sheet (1)

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